The Education Trust

Closing the gaps in opportunity and
achievement, pre-k through college.

January 30, 2015

Dr. Sophia McArdle
U.S. Department of Education
1990 K Street NW., Room 8017
Washington, DC 20006

Dear Dr. McArdle:

Please accept The Education Trust's comments on the Notice of Proposed Rulemaking (Docket ID ED-2014-OPE-0057) posted on Dec. 3, 2014.

Teachers are the most important in-school factor for student learning. Good teachers are critical to raising student achievement and closing the gaps that separate low-income students and students of color from their peers. Yet far too many teacher preparation programs fail to adequately address either the demands educators will face once they graduate or the needs of surrounding school districts.

This inattention is unfair to educators, who are sent into classrooms without the knowledge and skills they need to educate all students to college- and career-ready levels. And it is devastating to students, especially the low-income students and students of color who are most likely to be taught by newly minted teachers.[i] In too many cases, the kids who most desperately need the very best teachers are assigned those who are least equipped to grow their knowledge and skills.

That's why The Education Trust, an organization dedicated to promoting high academic achievement for students of color and those from low-income families, supports the Department of Education's effort to generate more meaningful, actionable information on the quality of teacher preparation programs.

Our comments offer support for — and, in some places, recommendations for improving further — four key areas of the proposal:

- The reporting and accountability indicators;
- The inclusion of alternate certification programs;
- TEACH Grant eligibility; and
- The timeline for implementing the proposal.

Proposed Indicators (§612.5)

Currently, states and institutions are required to report reams of data about teacher preparation, but very little of that information is useful. The proposed indicators will do a much better job of focusing attention where it is needed: on results. And they will help create more meaningful feedback loops for a full range of stakeholders — from prospective teachers to hiring school districts, college presidents, state education leaders, and preparation programs themselves.

- The requirements to report on **employment outcomes** are important because they help ensure that preparation programs are in tune with school districts' actual staffing needs. Currently, there's a glut of certified teachers in some areas and a dearth in others.[ii] By requiring reporting on teacher placement rates, both generally and for high-need schools, as well as on teacher retention rates in both settings, program officials — and their potential applicants — can ascertain whether they are aligning themselves with districts' staffing needs.

  Two of the allowable definitions of "teacher retention rate" would provide useful information. These include the percentage of new teachers hired in full-time teaching positions and serving at least three consecutive years within five years of being certified, and the percentage of new teachers hired full-time and reaching tenure within five years of being certified. However, the focus of the third definition, new teachers who were hired and then fired for reasons other than budget cuts, is problematic. Typically a small number, it overlooks the many teachers who leave high-need schools, or the profession altogether, voluntarily.

  Of the teachers who moved schools in 2012-13, only about 30 percent did so involuntarily, and of those who left teaching in 2012-13, only about 10 percent did so involuntarily.[iii] In other words, the majority of teachers who leave their schools, and the profession, do so voluntarily. With so many teachers leaving their schools without formal administrative action, it is a significant lapse to focus only on teachers who are fired. Teacher retention is an especially important issue for new teachers interested in working in high-need schools. Of those who intend to teach at high-need schools to get a TEACH Grant, 3 out of 4 wind up converting their grants to unsubsidized student loans because they do not fulfill the teaching obligation.[iv]

  Our recommendation is to remove this third definition of teacher retention from the proposed regulations.

- Done right, the requirements to report on the **student learning outcomes** of program graduates could generate more meaningful information about what happens after program graduates begin teaching. In too many preparation programs, the curriculum is disconnected from the new college- and career-ready standards, the coursework lacks effective instruction in practical skills, and there's a lack of quality control in choosing supervising teachers for teaching candidates' clinical practice.[v] In these instances, information on graduates' performance in the classroom will be a powerful catalyst for improvement. This information could also help to identify and learn from those programs that are doing a good job of preparing candidates for the demands of the classroom.

- As vital as these student learning measures are, no lone indicator can provide the full picture of how teachers are doing in the classroom. That's why **surveys of teachers' and employers' experiences** are also important. Good surveys can help identify specific areas where improvement is needed. For example, a quarter of teachers nationwide report feeling unprepared to work with children of varying abilities or to maintain classroom order, and a similar percentage of principals agree — suggesting important areas for improvement. But good surveys can also help identify strengths. For example, evidence suggests that many new teachers have more realistic expectations than veteran teachers of the number of special education students they will teach. Programs that ensure that their candidates have reasonable expectations should have confirmation that they're doing well on that front, as should program applicants. [vi]

We support these new indicators, but want to be very clear: **In moving to these new indicators, we believe that the U.S. Department of Education must significantly reduce the existing reporting requirements**. Existing reporting requirements, covering some 440 indicators, are ridiculously burdensome and often irrelevant.[vii] Current indicators, for example, show how many candidates obtained certification, but not how their students fared; they show how many students completed preparation programs, but not how many went on to teach. In order to reduce the burden on states and programs, allowing them to focus on collecting and reporting only the meaningful indicators, enumerated above, it is critical that the U.S. Department of Education lighten the load of old indicators under the Paperwork Reduction Act.

Scope of Programs (§612.4)

Currently, all traditional programs operated by an institution of higher education are considered a single program for reporting purposes, as are all alternative-route programs operated by that IHE. As a result, there is no way to distinguish programs within a given institution. The proposed regulations' shift to reporting at the program level rather than the institution level will help programs improve and candidates and school districts make better informed decisions.

Additionally, we support the proposed regulations' requirement to report data for all teacher preparation programs, whether or not they are based at institutions of higher education. This is key to gaining information about alternative certification programs. With 4 out of 10 new teachers now entering the profession through alternate-route programs — many of them teaching students of color and students in poverty — this is a troubling oversight.[viii]

We support including alternative certification programs in the regulations alongside traditional programs.

TEACH Grant Eligibility (Amended Part 686)

While the federal government sends billions of taxpayer dollars to teacher preparation programs, largely in the form of student aid, it has not required the programs to show that they are training candidates to teach effectively. This is especially worrisome in the case of the TEACH Grant program, which is intended to help teachers prepare to teach students on the poorly performing end of the achievement gap. Of the 38 teacher preparation programs designated low-performing or at risk through the current Title II reporting system, 22 have participated in the TEACH Grant program.[ix]

As an organization focused on equity, we strongly support the proposed regulations that would prevent programs that fail to prepare teachers effectively from continuing to get money to send teachers to the highest need schools. Linking TEACH Grant eligibility to program quality is an important lever for bringing accountability to the programs ostensibly equipping teachers to teach in the highest need schools.

Timeline for Implementation (§612.3, §612.4, §686.11, and §686.2)

The timelines for implementing these proposed regulations are ambitious, but given the importance of improving the quality and availability of information about teacher preparation programs, ambition is well warranted. We encourage you to maintain the proposed timeframes.

Conclusion

The proposed regulations represent an important shift to evaluating how preparation programs are doing on what really matters: preparing teachers who can teach effectively at the schools where students need them most. In our view, these regulations call for the right indicators, incorporate too-often-overlooked alternative certification programs, and create long overdue accountability by restricting TEACH Grant eligibility. And they do all that on a reasonable timeline.

These regulations — coupled with a significant reduction in current requirements — will be good for programs that want to improve, for teacher candidates, for school systems looking to hire quality teachers, and ultimately for students, particularly the students of color and low-income students most likely to be taught by novice teachers.

We thank you for your time and attention to this important matter and welcome the opportunity to provide any additional information as you move forward with these important changes.

Cordially,

Kati Haycock
The Education Trust

[i] Sarah Almy, Christina Theokas, "Not Prepared for Class: High-Poverty Schools Continue to Have Fewer In-Field Teachers" (Washington, D.C.: The Education Trust, Nov. 2010), http://www.edtrust.org/sites/edtrust.org/files/publications/files/Preparing_and_Advancing_0.pdf.

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Karen DeAngelis, Yuqin Gong, Jennifer Presley, and Bradford White, "Examining the Distribution of Teacher Quality in Illinois" (Edwardsville, Ill.: Illinois Education Research Council, Southern Illinois University Edwardsville, 2006), http://www.siue.edu/ierc/presentations/pdf/Northwestern.pdf.

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[ii] Commission on Effective Teachers and Teaching, "Transforming Teaching: Connecting Professional Responsibility with Student Learning" (Washington, D.C.: National Education Association, 2011), http://www.nea.org/assets/docs/Transformingteaching2012.pdf.

[iii] Rebecca Goldring, Soheyla Taie, Minsun Riddles, "Teacher Attrition and Mobility: Results from the 2012-13 Teacher Follow-up Survey" (U.S. Department of Education, National Center for Education Statistics, 2014) (Washington, D.C.: U.S. Government Printing Office, 2014), http://nces.ed.gov/pubs2014/2014077.pdf.

[iv] Tamara Hiler and Lanae Hatalsky, "TEACH Grant Trap: Program to Encourage Young People to Teach Falls Short" (Washington, D.C.: Third Way, 2015), http://www.thirdway.org/memo/teach-grant-trap-program-to-encourage-young-people-to-teach-falls-short.

[v] National Council on Teacher Quality, "2014 State Teacher Policy Yearbook" (Washington, D.C.: NCTQ, 2014), http://www.nctq.org/dmsView/2014_State_Teacher_Policy_Yearbook_National_Summary_NCTQ_Report.

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[vi] MetLife Foundation, "MetLife Survey of the American Teacher: Expectations and Experiences" (New York: MetLife Foundation, 2006), http://files.eric.ed.gov/fulltext/ED496558.pdf.

[vii] Sarah Almy, Melissa Tooley, and Daria Hall, "Preparing and Advancing Teachers and School leaders: A New Approach for Federal Policy" (Washington, D.C.: The Education Trust, Sept. 2013), http://www.edtrust.org/sites/edtrust.org/files/publications/files/Preparing_and_Advancing_0.pdf

[viii] C. Emily Feistritzer, "Profile of Teachers in the U.S. 2011" (Washington, D.C.: National Center for Education Information, 2011), http://www.ncei.com/Profile_Teachers_US_2011.pdf.

[ix] Tamara Hiler and Lanae Hatalsky, "TEACH Grant Trap: Program to Encourage Young People to Teach Falls Short" (Washington, D.C.: Third Way, 2015), http://www.thirdway.org/memo/teach-grant-trap-program-to-encourage-young-people-to-teach-falls-short.